

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, et al.,

NO.

Plaintiffs,

DECLARATION OF A.M.

V.

DONALD J. TRUMP, in his official capacity as President of the United States of America, et al.,

Defendants.

DECLARATION OF A.M.

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, A.M., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the parent of Minor A.M. I live in Lynnwood, Washington with my wife and
5 child.

6 3. I am a licensed social worker at a major hospital in Seattle, Washington.

7 4. My child is non-binary and uses they/them pronouns. I have chosen to refer to
8 them in this declaration as “Minor A.M.” because I am afraid for them and our family’s safety
9 and privacy in the current political climate. That is why I am also choosing to refer to myself by
10 my initials.

11 5. Minor A.M. is a very active and inquisitive six-year-old. They like school and
12 have a wide range of interests. They love history, learning about the military, playing with Legos,
13 and Star Wars. They are also autistic and have a 504 plan at school.

14 6. The first time I learned that my child was considering their gender was when they
15 were in preschool. They had talked about feeling more like a girl than a boy but had initially not
16 wanted to use different pronouns. My wife and I received an email from the preschool teacher
17 one day telling us that Minor A.M. had said that they were a girl and wanted to use she/her
18 pronouns. Minor A.M. was five years old at that time.

19 7. My wife and I are supportive of our child’s identity. When they told us they were
20 a girl, we alerted the important adults in their life to this change so that they could correctly
21 gender our child. When Minor A.M. was in kindergarten, they told us that they were actually
22 non-binary and wanted to use they/them pronouns. They were very insistent and confident in
23 these feelings.

24 8. In the beginning, the transition was difficult. Minor A.M. encountered a teacher
25 at school and some extended family members that repeatedly mis-gendered them and it was
26 upsetting. Minor A.M. told us that when that happened it upset them and made their heart and

1 stomach hurt. We had to work with the school and the district's Gender Inclusive Schools
 2 Coordinator to address these issues. Minor A.M. has a primary teacher that is very supportive.
 3 We are concerned that if they were to lose access to a supportive environment at school they
 4 would not want to go to school, and we would have a very difficult time getting them to go or
 5 stay.

6 9. I believe that mental health support is an important part of gender-affirming care,
 7 especially for people Minor A.M.'s age. It took a while, but we were able to find a mental health
 8 provider with experience in providing affirming care for children their age. Minor A.M. started
 9 getting mental health care at five years old. Once the therapy started and Minor A.M. had a
 10 supportive teacher, we noticed that they were a happier and more content child. It is very
 11 important to Minor A.M. that adults see them accurately as a non-binary person. When kids
 12 misgender them, they do not have as strong of a reaction and are able to correct them. When
 13 adults do not see them accurately it causes Minor A.M. significant distress. Minor A.M. will
 14 become dysregulated and shut down when they encounter an adult who does not see them
 15 accurately or misgenders them. They have shared with us that it hurts their heart, and they get a
 16 stomachache.

17 10. Minor A.M. is six years old now and has had mental health services for nearly a
 18 year. Therapy has been extremely helpful. It has helped normalize their experience and sense of
 19 who they are. It has allowed for a more typical childhood development and has allowed them to
 20 participate in their life more fully.

21 11. As a non-binary young person, Minor A.M.'s journey continues, but with on-
 22 going support and mental health services, they will continue to thrive. At six years old I
 23 understand that my child is years out from any medical procedures, but if they do not have access
 24 to the care they need, when they need it, it will be detrimental to them and our family. When and
 25 if the time comes, it is very important to us to live in a place where we have access to all options.
 26 This is not a linear process, and we do not know how the journey will go or where Minor A.M.

1 will end up on it. It is also my experience that lack of access to the appropriate care can have a
 2 significant detrimental impact on trans and gender expansive people's safety as they navigate
 3 their world.

4 12. An important part of gender-affirming care is that the person gets to live
 5 authentically as themselves, everywhere they are. Minor A.M. is very insistent on this. It is very
 6 obvious and distressing to them when that is not the case.

7 13. None of this is fast. This is a very slow, deliberate process. The narrative that
 8 these decisions are made quickly without careful consideration or consultation with mental and
 9 physical health providers is false.

10 14. Concerning the recent Executive Order (EO) restricting gender-affirming care for
 11 transgender youth, it is upsetting, and I am terrified to think about the possibility of having to
 12 tell our child that they can't have gender-affirming care. We noticed after the election that
 13 Minor A.M.'s anxiety had increased so we stopped talking about current events, the EO, and the
 14 impacts in front of them. Since the EO issued, Minor A.M. is having a harder time at school and
 15 has been acting out. Their teacher shared that they are seeing this with the entire class as the
 16 anxiety for families with transgender and gender expansive children increases.

17 15. I fear that if this EO isn't stopped, it will have significant impacts on
 18 Minor A.M.'s mental and physical health. If we could not find gender-affirming care for our
 19 child in the United States, we would have to consider moving to another country in order for
 20 them to get the care they need. Washington is our home. Both my wife and I have aging parents
 21 who live here and that we help take care of, and we have careers and communities that we are
 22 part of and that mean a great deal to us. We do not otherwise want to leave the United States.
 23 We also do not have the resources to sue the Federal Government ourselves. Not only would that
 24 put us at financial risk, but it would also put our family's safety at extreme peril.

25 I declare under penalty of perjury under the laws of the State of Washington and the
 26 United States of America that the foregoing is true and correct.

1 DATED this _____ day of February 2025, at _____, Washington.

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4 A.M.
5 Parent of Minor A.M.
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1 DATED this 4th day of February 2025, at Lynnwood, Washington.
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Parent of Minor A.M.

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